

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In the Matter of Application of PANDORA MEDIA, LLC,

Applicant,

-For an Order-

To Compel WORD COLLECTIONS, INC. to Produce  
Documents,

Respondent.

Misc. Civil Action No. \_\_\_\_\_

**NOTICE OF MOTION TO  
COMPEL RESPONSES TO  
SUBPOENA**

TO: Richard S. Busch  
Mary Catherine Amerine  
KING & BALLOW LAW OFFICES  
2121 Avenue of the Stars, Suite 800  
Los Angeles, CA 90067

**PLEASE TAKE NOTICE** that Applicant Pandora Media, LLC (“Pandora”) will move the United States District Court for the Southern District of New York, at the United States Courthouse, located at 500 Pearl Street, New York, New York 10007 for an order pursuant to Rules 37 and 45 of the Federal Rules of Civil Procedure (“FRCP”) ordering non-party Word Collections, Inc. (“Word Collections”) to comply with Pandora’s Subpoena *duces tecum* served on April 29, 2023 by producing responsive documents to be used in a series of copyright infringement cases brought against Pandora by nine Plaintiffs in the United States District Court for the Central District of California, all of which have been consolidated for at least pre-trial purposes and styled *In re Pandora Media, LLC Copyright Litigation*, Master File No. 2:22-cv-00809-MCS-MAR (the “Consolidated Litigation”).

In support of this motion, Applicant will rely upon the Declaration of Allison Aviki, dated August 31, 2023, and the exhibits attached thereto, the accompanying Memorandum of Law, and the filings from the Consolidated Litigation referred to therein.

Dated: August 31, 2023

New York, NY

MAYER BROWN LLP

By: /s/ Allison Aviki  
Allison Aviki

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